

AHMAD KESHAVARZ

Attorney at Law

16 COURT ST., 26TH FLOOR WWW.NEWYORKCONSUMERATTORNEY.COM
BROOKLYN, NY 11241-1026 E-mail: ahmad@NewYorkConsumerAttorney.com

Telephone: (718) 522-7900
Fax: (877) 496-7809

June 11, 2025

VIA ECF

Magistrate Judge Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Plaintiff's letter motion to enlarge time from 6/12 to 6/16 to file opposition to DE 29, letter for pre-motion conference to file motion to dismiss of Defendants Sontag & Hyman, P.C and Marc Hyman.
Perpetual Ashare v. Sontag & Hyman, P.C et al., Case 1:25-cv-02834-GHW-KHP

Dear Judge Parker:

The undersigned, along with co-counsel Manhattan Legal Services, represents Plaintiff Perpetual Ashare the above-entitled action against alleging violations of the Fair Debt Collection Practices Act and various state law claims against debt collection law firm, Sontag & Hyman, P.C and a principal at the firm, Marc H. Hyman, (collectively the "Attorney Defendants"); and state law claims based on the same nucleus of operative facts against property owners East Harlem Mec Parcel C, L.P., and East Harlem MEC Parcel C Housing Development Fund Corporation and their property management companies, Richman Property Services Inc. and Metro 125, Inc. (collectively the "Landlord Defendants")

On June 9, 2025 the Attorney Defendants filed a letter [DE 29] for a pre-motion conference to file a Fed. R. Civ. P. 12(b)(6) motion to dismiss; and to extend the time by 30 days to answer to give the parties an opportunity to confer in accordance with Rule III of Your Honor's Rules, and to give the other defendants time to appear by counsel in the action. On June 10 Your Honor granted the application.

Pursuant to § III(b) Your Honor's Individual Practice Rules Plaintiff's deadline to file opposition to the application of Attorney Defendants is three business days from the date of the filing of the letter motion for pre-motion conference to file an opposition.

Pursuant to § I(c) of Your Honor's Individual Practice Rules, Plaintiff seeks an extension of the time to file an opposition the DE 29 and states as follows:

- The original date is June 12, 2025.
- There have been no previous requests for extension of this deadline.
- Counsel for the Attorney Defendants, the only ones to date who have appeared, consent to this request.
- The request is to extend the deadline to June 16.

The undersigned apologizes for not filing this application at least two days prior to the deadline to file the opposition which, as previously noted, was due three days after the application. I will take more care to meet the individual practice deadlines in the future. The extension is needed because the undersigned was in meetings most of 6/10, has an all-day mediation on 6/11, and a meeting the morning of 6/13.

The undersigned thanks the Court for its consideration.

Sincerely,

/s/

Ahmad Keshavarz